



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 21, 2022

VIA ECF

The Honorable James L. Cott
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Caitlin Dickerson v. Customs and Border Protection*, 19 Civ. 9017 (JLC)

Dear Judge Cott:

This Office represents U.S. Customs and Border Protection (“CBP”) in the above-referenced FOIA case. On behalf of the parties, we write to notify the Court of the parties’ agreement on an issue relating to the stipulation and order of dismissal of Plaintiff’s Claim for Attorneys’ Fees and Costs, Dkt. No. 72. For the avoidance of doubt, we also seek the Court’s approval of this agreement.

Specifically, since the Court entered the parties’ stipulation regarding Plaintiff’s claim for attorneys’ fees, the parties have met and conferred on multiple occasions regarding the information that Plaintiff must provide CBP in order for the agency to effectuate payment of the agreed-upon attorneys’ fees and litigation costs, as well as CBP’s reporting obligations of any payments made under the Stipulation pursuant to relevant IRS regulations. The parties have agreed that, in order to address the concerns expressed by Plaintiff and CBP regarding these respective issues, CBP may fulfill its obligation under Paragraph 1 of the Stipulation by paying the amount set forth therein to The Atlantic Monthly Group LLC (Plaintiff’s employer), rather than to Plaintiff Caitlin Dickerson herself. As such, CBP will only generate and issue an IRS 1099 Form to Plaintiff’s employer. The parties respectfully request that the Court so-order this stipulation.

We thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel for Plaintiff (via ECF)